

**/IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Donald C. McMeans,

Plaintiff

v.

CIVIL ACTION NO. _____

President Barack H. Obama

Defendant

COMPLAINT

1. This action, which seeks an order in the nature of mandamus, is brought pursuant to **10 USC § 333** to invoke the peremptory duty of the President of the United States to Renaissance Broadcasting Corporation (RBC) and myself to suppress the unlawful combination or conspiracy that has obstructed the due course of justice under **10 USC § 333** pursuant to the obstruction of the execution of the President's duty under **10 USC § 333**. Jurisdiction exists in the District Court by virtue of **28 USC §§ 1346 (a) (2), 1361 and 1402 (a) (1)**.
2. Plaintiff resides at 154 Crystal Run Drive, Middletown, New Castle County, Delaware, 19709. Telephone Number (302) 378-5647.
3. Defendant resides at 1600 Pennsylvania Avenue, N.W. Washington, District of Columbia 20500.
4. The alleged obstructions of the due course of justice pursuant to the obstruction of the execution of the President's peremptory duty to RBC have been continuing without abatement since December 4, 1993.
5. The plaintiff, on behalf of himself and the shareholders of RBC, filed a petition with the President of the United States on January 20, 2009. Contrary to the clearly expressed

intent of Congress, the petition was assigned to the United States Department of Justice, Executive Office for United States Trustees.

6. The mendacious July 8, 2009 and January 7, 2011 responses prepared by the United States Department of Justice, Executive Office for United States Trustees, withheld the underlying State court complaint and Bankruptcy Court motion filed against RBC and the related orders, which constitute conclusive proof of per se violations of the evil that **10 USC §333** was enacted to suppress; fabricated fictitious pleadings out of whole cloth; and blatantly depicted the fictitious language as a representative of the actual pleadings.
7. The mendacious reports were submitted to United States Senator Robert Menendez in his capacity as the representative of shareholders of RBC that reside in the State of New Jersey.
8. The New Jersey offices of Senator Menendez and Congressman Donald Payne stated that they were unable to circumvent the obstructions of the due execution of the President's peremptory duty to RBC.
9. The majority ownership of RBC is held by residents of Delaware. The efforts of the plaintiff to enlist the assistance of the Delaware congressional delegation have been unsuccessful.
10. Congress enumerated specific standards that must be deemed a State denial of the equal protection of the laws to which the citizens of a State are entitled by the Constitution of the United States.
11. Congress determined that in all such cases or whenever an unlawful combination or conspiracy shall obstruct the due execution of the laws of the United States or the due course of justice under the laws of the United States, it shall be lawful for the President of

the United States and it shall be his duty to suppress such unlawful combination or conspiracy, forthwith, by any means he considers to be necessary.

12. The judicial records developed pursuant to New Jersey Superior Court Docket ## L-1116-80 and A-2428-80T1 and the United States Bankruptcy Court for the District of New Jersey, Bankruptcy # 83-05545, provide conclusive proof of an unlawful combination or conspiracy that has been subjecting RBC and the plaintiff to the precise acts that 10 USC § 333 was enacted to suppress for thirty (30) years without abatement.
13. Hugh M. Leonard, United States Trustee for Delaware and New Jersey, and his successors in office have combined with the United States Department of Justice, Executive Office for United States Trustees, to aide and sustain the 10 USC § 333 exigency for the last eighteen (18) years by obstructing the execution of the President's peremptory duty under 10 USC § 333.
14. The actions of United States Trustee Leonard, his successors in office, and the Executive Office for United States Trustees have been discriminatory with respect to the race of the plaintiff - the principal shareholder of RBC - and the majority of RBC's shareholders. The announcement of the African American-ownership of RBC by local and national media may have stimulated the 10 USC § 333 conspiracy.
15. Congress, by the use of the phrase, "as he deems necessary," with regard to the means the President shall use to execute his peremptory duty, designated the President of the United States, himself, as the sole and exclusive judge of the facts that establish the State denial of equal protection, the obstruction of the due execution of the laws of the United States, and the obstruction of the due course of justice under the laws of the United States.

16. The phrase, "as he deems necessary," was adopted by Congress to prevent the type of obstructions that have allowed subordinate employees of the United States Department of Justice to sustain the 10 USC § 333 exigency against RBC and the plaintiff since 1993.
17. The failure to adhere to the Congressional intent for the phrase, "as he deems necessary," as construed by the United States Supreme Court in *Martin v. Mott*, 25 U.S. 19, 31-32 (1827), has prolonged the oppression of the plaintiff and RBC by subjecting them to an additional 18 years of irreparable harm and tyranny by members of the unlawful combination or conspiracy employed by the Government of the United States.
18. Plaintiff prays for the following relief: An order in the nature of mandamus that aids the execution of the peremptory duty of the President of the United States by directing President Barack H. Obama, President of the United States, to execute, forthwith, his peremptory duty to RBC under 10 USC § 333.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 30, 2011

/s/ Donald C. McMeans
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